

# Multnomah Community Television

ORIGINAL  
FILE

Serving East Multnomah County  
Before the  
Federal Communications Commission  
Washington, D.C. 10554

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DEC - 7 1992

## Programming Services:

■ Public Access

■ Educational

■ Government

■ Community

■ East Metro Edition

## MCTV Channels

Seen on Paragon  
Cable:

11

CAN

Community Access  
Network

21

MCTV

Multnomah Community  
Television

22

MPAC

Multnomah Public  
Affairs  
(East County only)

31

Educational Access  
ME/U

(East County only)

32

Mt. Hood Community  
College Telecourses

(East County only)

33

Portland Cable Access

34

Community Bulletin  
Board

(East County only)

58

Program Guide  
Video Newsletter

(East County only)

In the matter of

Implementation of Section 10 of the Cable  
Consumer Protection and Competition Act )

258

Indecent Programming and Other Types of  
Materials on Cable Access Channels )

To the Commission:

COMMENTS OF  
Multnomah Community Television

MM Docket No. 92-258

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FCC - MAIL ROOM

Multnomah Community Television (MCTV) submits these comments in response to the above captioned proceeding and in support of the comments filed in the proceeding by the Alliance for Community Media, Alliance for Communications Democracy, American Civil Liberties Union and The People for the American Way.

In particular, MCTV agrees that the provisions of Sections 10 (c) and 10 (d) will be unconstitutional, however they are implemented. However, assuming that the Commission decides to adopt rules to implement either Section 10 (c) or 10 (d):

a. The rules should be specific and as narrowly drawn as possible, and must contain limitations that prevent cable operators from hampering use of access channels by those who wish to produce live or cablecast taped programming under the guise of applying the rules. MCTV provides a variety of live public affairs, religious, public service, entertainment and live call-in programming that would be eliminated or adversely effected by such restrictions.

b. Access centers have very limited resources. The FCC rules should make it clear that any actions taken by an operator under Section 10 must be undertake at the operator's own expense.

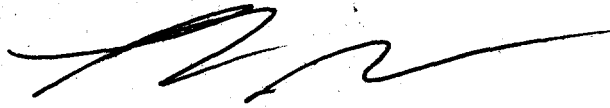
c. Approximately 1200 hours of video and text programming are cablecast each week on the access channels in our community. Much of the programming is produced by volunteers and experience shows that it must be as easy as possible for these volunteers to use. Any rule must recognize that any roadblocks that are placed in the way for production will result in a reduction in speech.

No. of Copies rec'd

List A B C D E

MCTV provides community television services on its eight channels to East Multnomah County. These services include: live coverage of local government meetings (e.g., City Councils, County Commissioners, Planning Commissions); coverage of local education (e.g., Board of Education meetings, school events and athletics, a live call-in show where students get help with their homework from other students); East Multnomah County's only local news show; public access programming produced by volunteer producers by people of all political and religious beliefs, from all walks of life and from a wide variety of racial and ethnic groups. The impact of rules to implement Sections 10 (c) and 10 (d) could result in a twenty-five percent cut back in programming for the communities in East Multnomah County.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Brading', with a long horizontal flourish extending to the right.

Robert Brading  
Executive Director  
Multnomah Community Television  
26000 SE Stark  
Gresham, OR 97030

Date: December 7, 1992